

Attached is a revised version of the previous proposed permit conditions I sent to all of you in January. There was a bit of miscommunication and I hadn't included all of the parameters EPA wanted in the sediment and water quality monitoring studies. I have revised those lists (revisions shown in red on the attached document). I have also made a few minor editorial level changes and have included substantially more detail for the fish tissue study.

Note that the effluent limitations have not been proposed - these will be based on the permit renewal application and negotiations/discussions with EPA.

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Jim and Phil -

Three points you and/or your staff should consider at this point:

- [1] The additional parameters are very modest in terms of cost compared to the rest of the requirements and the previous analysis of the proposed permit compared to the old one is still accurate. We are preparing cost estimates for you to consider, and should have those in a few days. These should help in the decision making and planning processes for the permit renewal.
- [2] It has been almost three years since the renewal application was submitted. I believe it would be a good idea to review the DMR data for that period to see if there are any changes that should be brought to the attention of EPA prior to the issuance of a draft permit.
- [3] For the previous permit, EPA set a total allocation for nitrogen and phosphorous and then required the canneries to divide it in a mutually agreeable fashion. This may be the same procedure that happens for this permit, and it might be a good idea to begin your negotiations as to how it should go, if you want any changes.

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Carl -

The attached file is not quite what we discussed and talked about the other day. I took a look at some of the laboratory analytical costs and modified the list of analytes for the studies. I think what is included will provide EPA with the information you need, at the same time keeping the analytical costs to a minimum. Dioxin in particular is costly, as well as organochlorine compounds when you start increasing the number of samples to be analyzed. Give me a call, maybe with Doug and Cindy on line, and we can finalize the list EPA will accept.

I believe USEPA will have to receive ASEPA approved mixing zones (and a WQC?) to issue the permit. Has ASEPA taken any action on the application for these mixing zones that the canneries submitted at about the time they submitted the NPDES renewal application. It might be a good idea to check on this before we get too far.

We are working on getting a map to you as soon as possible.

Regards to all,

Steve